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6 Attorneys for Nicholas Gharfouria

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 \* \* \*

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 NICHOLAS GHARFOURIA,  
15 Defendant.

2:10-cr-547-RLH-PAL-1

**STIPULATION TO EXTEND**  
**DEADLINES IN THIS COURT'S**  
**MARCH 17, 2015 ORDER BY**  
**FORTY-FIVE (45) DAYS**

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17 The United States of America, by Assistant United States Attorney Elizabeth Olson White,  
18 and Defendant NICHOLAS GHARFOURIA, by Assistant Federal Public Defender Nisha  
19 Brooks-Whittington, submit the following Joint Stipulation to extend, by forty-five (45) days, all of  
20 the deadlines set in this Court's Order dated March 17, 2015. *See* CR 909.

21 The parties agree and stipulate to the following:

22 1. On January 3, 2013, this Court sentenced Defendant to 180 months' imprisonment  
23 on his conviction for drug-related offenses. CR 758.

24 2. On March 13, 2015, Defendant filed a *pro se* motion for a reduction of sentence  
25 pursuant to 18 U.S.C. § 3582(c)(2). CR 908.

26 3. On March 17, 2015, this Court issued an Order appointing the Federal Public  
27 Defender to represent Defendant, and setting deadlines. Specifically, the Court ordered the  
28 Probation Office to provide certain documents to the parties within 30 days (i.e., by April 16, 2015)

1 and ordered the Federal Public Defender to file any appropriate motion or stipulation within 120 days  
2 (i.e., by July 15, 2015). CR 909.

3 4. Counsel for the defendant needs additional time to research the case to determine  
4 whether the defendant is eligible for sentence reduction.

5 5. The defendant is in custody and does not oppose a continuance.

6 6. For the reason stated above, the parties respectfully request that the Court issue an  
7 order extending the deadlines in the Court's March 17, 2015 Order, by forty-five (45) days.

8 DATED this 15<sup>th</sup> day of July, 2015.

9 Respectfully submitted,

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11 RENE L. VALLADARES  
12 Federal Public Defender

13 /s/ Nisha Brooks-Whittington

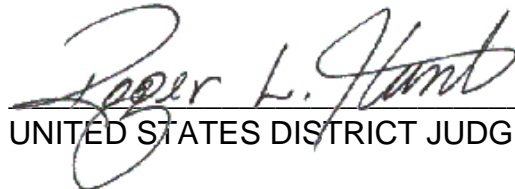
14 NISHA BROOKS-WHITTINGTON,  
Assistant Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

/s/ Elizabeth O. White

15 ELIZABETH O. WHITE,  
16 Appellate Chief and  
17 Assistant United States Attorney

18 IT IS SO ORDERED.

19   
20 UNITED STATES DISTRICT JUDGE

21 DATED: July 16, 2015  
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